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Elridge A. Stafford
Executive Director-
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December 16, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 - 12th Street, SW, TW-A325
Washington, DC 20554

RE: CC Docket No. 99-200, Number Resource Optimization

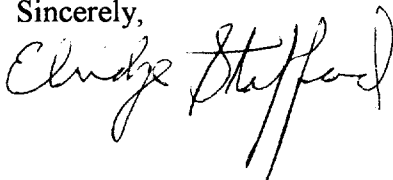
Dear Ms. Salas:

Please be advised that on December 15, 1999, Bill Johnston, Mike Whaley and the undersigned, representing U S WEST, met with Yog Varma, Charles Keller, Blaise Scinto, Diane Harmon, Patrick Forster, Les Selzer, Barry Payne, Jeannie Grimes and Aaron Goldberger of the Common Carrier Bureau and Kelley Quinn of the Wireless Telecommunications Bureau to discuss issues concerning the above-captioned proceeding. Attached hereto is a copy of the presentation material that was distributed and discussed at the meeting.

In accordance with Section 1.1206(b)(2) of the Commission's rules, the original and one copy of this letter and attachment are being filed with your office for inclusion in the public record of this proceeding. Acknowledgment and date of receipt of this submission are requested. A duplicate of this letter is included for this purpose.

Please contact me at 202-429-3134 should you have questions concerning this matter.

Sincerely,



Attachment

cc: Patrick Forster
Aaron Goldberger
Jeannie Grimes
Diane Harmon
Charles Keller

Barry Payne
Kelley Quinn
Blaise Scinto
Les Selzer
Yog Varma

File of Carlos read
12/16/99



COST RECOVERY FOR NUMBER POOLING U S WEST

- End user charge makes the most sense
 - Large non recurring expenditures
 - Benefit all customers through number conservation
 - Ongoing operations and maintenance costs become infrastructure
- If not an end user charge then handle as an exogenous change under price cap rules
 - Regulatory mandate
 - Extraordinary cost
 - Requires a separations change
- Options to recover exogenous costs
 - New charge on a per line basis to interstate customers
 - New charge on a MOU basis to interstate customers
 - Spread as a normal exogenous cost in a cost causative manner to all services (i.e. no unique charge)

U S WEST

Number Resource Optimization

CC Docket No. 99-200

Presented by

Bill Johnston

Elridge Stafford

Mike Whaley

December 15, 1999

Index

- Administrative Issues
- Choice of Optimization Measures
- Pooling Implementation/Rollout
- Area Code Relief
- Conservation
- Cost Recovery

Administrative Issues

- FCC should adopt the industry's definitions and guidelines as principles, not rules.
- The Commission must make COCUS reporting and forecasting a national requirement for all users of the numbering resource.
- All NXX code holders must be subject to audit.
- NANPA should be empowered to advise the FCC of non-compliance CO Code guidelines and withhold or return code requests for non-compliant carriers.

Choice of Optimization Measures

- The FCC should establish a utilization threshold to measure optimization of numbering resources.
- The FCC should allow carriers who satisfy the utilization threshold to choose the optimization method that best meets their business needs.
 - Pooling should not be mandatory for those who satisfy the threshold requirements.

Number Pooling and Implementation/Roll-out

- If and where needed, 1K Block Number Pooling should be implemented using a phased in approach, rolled out on a nationally coordinated basis.
 - Prioritize it like LNP - Top 100 MSAs
 - Pooling should be limited to LNP capable carriers.
 - Avoid using contaminated blocks based on the Illinois learning experience.
 - Maximum 2 NPA's per region per quarter.
- Deploy by Rate Center, in NPAs forecasted to exhaust in 3-5 year timeframe.
- Deployment should be done in conjunction with the development of a pooling administrator and the resources to manage it.

Number Pooling and Implementation/Roll-out

- U S WEST OSS system modifications will require 18 Months from the date of an order.
- Pooling should not be required until NPAC release 3.0 is available.
 - To migrate 1.4 to 3.0 will require major database conversions that could be avoided by waiting for 3.0.
 - Pooling implemented prior to 3.0 will force the unnecessary expenditure of resources and money as well as force a cut over transition that could impact our ability to provide number portability and pooling during the change.
- Enough pooling trials have been authorized.

Area Code Relief

- The FCC should order:
 - Overlays and 10-Digit Dialing as measures to be used in conserving numbers and in area code relief.
 - Overlays must continue to be technology neutral.
 - Overlays are efficient and effective NPA relief remedy.
 - Overlays minimize societal cost and confusion to customers.
 - NPA splits may inefficiently use the NPA resource.
 - 10-digit dialing is becoming the norm.

NANP Conservation

- The FCC should direct the NANPA to go back and reclaim unused NXX's.
- U S WEST believes in the value of Rate Center Consolidation
- NANP Expansion is coming.
- Do not release the D-digit until there is full expansion of the NANP.
 - This would be confusing to customers
 - Releasing the D-digit prematurely will create an increased demand on codes due to the use of those codes by carriers today.
- Final NANP expansion decisions may obviate the need to release the D-digit.